

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MULTI ACCESS LIMITED,

Plaintiff,

- against -

GUANGZHOU BAIYUNSHAN  
PHARMACEUTICAL HOLDINGS CO., LTD.  
(AKA GUANGZHOU BAIYUNSHAN  
PHARMACEUTICAL HOLDING CO., LTD.);  
WLJ (AMERICA) CO. INC.; GUANGZHOU  
WANGLAOJI GREAT HEALTH CO., LTD.;  
GUANGZHOU WANG LAO JI GREAT  
HEALTH INDUSTRY CO., LTD. (AKA WLJ  
GREAT HEALTH INDUSTRY CO., LTD.);  
GUANGZHOU WANGLAOJI  
PHARMACEUTICAL CO., LTD.;  
GUANGZHOU WANG LAO JI GREAT  
HEALTH ENTERPRISE DEVELOPMENT CO.,  
LTD. (AKA WLJ GREAT HEALTH  
ENTERPRISES DEVELOPMENT CO., LTD.);  
GUANGZHOU PHARMACEUTICAL  
HOLDINGS LTD. (AKA GUANGZHOU  
PHARMACEUTICAL GROUP); GUANGZHOU  
WANG LAO JI GREAT HEALTH ENTERPRISE  
CO., LTD.; GUANGZHOU WANGLAOJI  
HEALTH INDUSTRY CO., LTD., and TRISTAR  
FOOD WHOLESALE CO. INC.,

Defendants.  
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Civil Action No. 1:20-cv-07397-LJL

**NOTICE OF MOTION FOR  
ALTERNATIVE SERVICE**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Plaintiff Multi Access Limited (“MAL”) will move before the United States District Court for the Southern District of New York before the Honorable Lewis J. Liman, for an Order granting MAL’s Motion for Alternative Service pursuant to Federal Rules of Civil Procedure 4(h) and 4(f)(3).

PLEASE TAKE FURTHER NOTICE that in support of its Motion, MAL relies upon the attached Memorandum of Law submitted in support of its Motion, the supporting Declaration of Anthony Mboho, the supporting Declaration of Susan Okin Goldsmith (and Exhibits A-H attached thereto), and the supporting Declaration of Wei Zhang, Ph.D.

DATED: July 19, 2023

Respectfully submitted,

McCARTER & ENGLISH, LLP

By: /s/ James H. Donoian

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